

EXHIBIT 1-A BAYLOR

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

DOLORES LOZANO;

Plaintiff,

v.

BAYLOR UNIVERSITY,
ART BRILES, *in his individual capacity*,
and
IAN McCRAW, *in his individual capacity*,

Defendants.

Case No.: 6:16-cv-00403

Hon. Robert Pitman

**PLAINTIFF DOLORES LOZANO'S OBJECTIONS TO DEFENDANT
BAYLOR UNIVERSITY'S DEPOSITION DESIGNATIONS FOR TRIAL**

TO THE HONORABLE JUDGE OF THE COURT:

Plaintiff serves these objections in response to the deposition testimony designated in Baylor University's Deposition Designations for Trial. Plaintiff asserts the objections identified below. Plaintiff's objections include contiguous testimony covered by the substance of the objections within the deposition testimony.

OBJECTIONS

DEVIN DEON CHAFIN

Page: Line

10:10-10:11 Relevance(401, 402, 403),

21:18-24:21 Relevance (401, 402, 403), Improper Character (404)

DEVIN DEON CHAFIN (continued)**Page:Line**

31:2-42:18	Relevance (401, 402, 403), Improper Character (404)
50:12-15	Relevance (401, 402, 403), Sexual History (412)
54:19-55:23	Hearsay (801, 802), Lack of Personal Knowledge (602)
73:24-74:14	Non-responsive, Lack of Personal Knowledge (602)
80:22-81:15	Non-responsive, Relevance (401, 402, 403)
82:4-83:21	Relevance (401, 402, 403)
86:7-89:12	Relevance (401, 402, 403), Lack of Personal Knowledge (602)
101:19-101:16	Relevance (401, 402, 403), Improper Character (404)
109:16-21	Relevance (401, 402, 403)
114:1-23	Relevance (401, 402, 403)
132:9-132:16	Relevance (401, 402, 403)

Plaintiff objects to the designations to the extent they incorporate a purported errata. The errata sheet received on June 3, 2021 is unsigned photocopy. See attached Exhibit A.

LILLIAN LOZANO**Page:Line**

37:18-37:17	Relevance (401, 402, 403)
38:11-38:21	Relevance (401, 402, 403)
40:23-40:25	Relevance (401, 402, 403), Improper Character (404)
40:6-40:21	Relevance (401, 402, 403), Improper Character (404)
40:23-40:25	Relevance (401, 402, 403), Improper Character (404)
41:6-42:13	Relevance (401, 402, 403), Improper Character (404)
42:15-42:19	Relevance (401, 402, 403), Improper Character (404)
42:21-43:2	Relevance (401, 402, 403), Improper Character (404)
43:8-44:18	Relevance (401, 402, 403), Improper Character (404)
44:20-44:25	Relevance (401, 402, 403), Improper Character (404)
54:2-20	Hearsay (801, 802)

55:22-56:8	Hearsay (801, 802)
87:22-25	Hearsay (801, 802)
93:22-94:2	Hearsay (801, 802)
94:6-94:18	Hearsay (801, 802), Relevance (401, 402, 403), Improper Character (404)
94:20-95:10	Hearsay (801, 802), Relevance (401, 402, 403), Improper Character (404)
97:14-99:16	Hearsay (801, 802), Relevance (401, 402, 403), Improper Character (404)
99:20-99:25	Hearsay (801, 802), Relevance (401, 402, 403), Improper Character (404)
100:2-100:25	Hearsay (801, 802), Relevance (401, 402, 403), Improper Character (404)
126:5-126:22	Relevance (401, 402, 403) Improper expert testimony (702)
127:3-10	Relevance (401, 402, 403) Improper expert testimony (702)
146:10-17	Relevance (401, 402, 403)

PATRICK SWANTON

Page:Line

78:3-78:10	Non-Responsive, Lack of Personal Knowledge (602), Relevance (401, 402, 403)
88:3-88:14	Designation begins with an answer; Should begin with 87:25.
88:12-24	Refers to Exhibit 10 introduced earlier. See Plaintiff's designations for completeness.

WES YEARY

Page:Line

12:9-10	Relevance (401, 402, 403)
74:13-19	Hearsay (801, 802), Relevance (401, 402, 403), Lack of Personal Knowledge (602), Ms. Williams has a confidential settlement agreement with Baylor.
83:19-24	Hearsay (801,802,803)
83:25-84:6	Hearsay (801,802,803)
84:14-18	Hearsay (801,802,803)

Dated: September 22, 2023

Respectfully submitted,

/s/ Sheila P. Haddock

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CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2023, I electronically filed the foregoing paper with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record in this matter.

/s/ Sheila P. Haddock

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From: TranscriptsTX transcriptstx@lexitaslegal.com

Subject: ERRATA PAGES of Devin Chafin; 4/29/2021; Dolores Lozano V. Baylor University; Art Briles, et al

Date: June 3, 2021 at 8:45 AM

To: lgary@thompsonhorton.com, lbrown@thompsonhorton.com, hmcintush@thompsonhorton.com, ehumphrey@thompsonhorton.com, lprice@thompsonhorton.com, lwhiting@thompsonhorton.com

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Counsel,

Our office does not file errata pages for non-Texas state cases. However, we received the attached changes & signature / errata pages for the above-referenced deposition & are routing these pages to you, the custodial attorney.

Thank you,

Ref: a062K00001zQKmvQAG

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Chafin, Devin -
78801...gs.pdf

Page 1

Attorney: Mary Beth Scott

Date: 04/23/21

OA: Leila Gary

Case Style: Dolores Lozano -vs- Baylor University, et al.

Page	Line	Correction	Reason for Correction
6		Page 44, lines 5-6, mark Confidential	
7		Page 105, lines 11-12, mark Confidential	
8		Page 116, line 21, "No."	
9		Page 198, line 19, Add - "but that wasn't	
10		until I was being dismissed in 2016 that	
11		Coach Leb and I talked about it, after	
12		the ESPN article had come out and he	
13		had read it. It was like in hindsight if	
14		I had just let her hit me we wouldn't	
15		be here."	
16		Page 199, line 5, "No, I was dismissed	
17		at that point and didn't go back to the	
18		team."	
19		Page 216, line 21, "No, we both responded to it."	
20		Page 217, lines 15-17, "I did reapply and did	
21		40 hours of community service in Oklahoma	
22		City for Judicial Affairs."	
23			
24			
25			

Devin Deon Chafin

Page 2

Pages 226

Correction Sheet

Witness:DEVIN DEON CHAFIN

Reporter: DB

Attorney:Mary Beth Scott

Date: 04/29/21

OA: Leila Gary

Case Style: Dolores Lozano -vs- Baylor University, et al.

Page	Line	Correction	Reason for Correction
7		Page 219, line 22, "Yes, I signed something."	
8		Page 220, line 21, "Completed in 2-4 week	
9		Sessions from June 2020 to August 2020.	
10		while staying home full time with our	
11		5 month old son during Covid."	
12		Page 221, line 7, "I graduated August	
13		15, 2020 with a Bachelor of Science in	
14		Education."	
15		Page 222, line 1, "I didn't speak with	
16		anyone except Mack and Bethany in	
17		Judicial Affairs about my outstanding	
18		community service hours to remove	
19		my registration hold."	
20			
21			
22			
23			
24			
25			

EXHIBIT 1-B McCAW

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

DOLORES LOZANO;

Plaintiff,

v.

BAYLOR UNIVERSITY,
ART BRILES, *in his individual capacity*,
and
IAN McCAW, *in his individual capacity*,

Defendants.

Case No.: 6:16-cv-00403

Hon. Robert Pitman

**PLAINTIFF DOLORES LOZANO'S OBJECTIONS TO DEFENDANT
IAN MC CAW'S DESIGNATION OF DEPOSITION TESTIMONY**

TO THE HONORABLE JUDGE OF THE COURT:

Plaintiff serves these objections in response to the deposition testimony designated in Ian McCaw's Designation of Deposition Testimony. Plaintiff asserts the objections identified below. Plaintiff's objections include contiguous testimony covered by the substance of the objections within the deposition testimony.

OBJECTIONS

DEVIN CHAFIN

82:3-24 Relevance (401, 402, 403)

85:8-86-6 Relevance (401, 402, 403)

RON MURFF

208:14-212;;23 Hearsay (801. 802) Lack of Personal Knowledge (602, Relevance (401, 402, 403).

Dated: September 22, 2023

Respectfully submitted,

/s/ Sheila P. Haddock

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Attorney-in-charge

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/s/ Sheila P. Haddock

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EXHIBIT 1-C BRILES

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

DOLORES LOZANO;

Plaintiff,

v.

BAYLOR UNIVERSITY,
ART BRILES, *in his individual capacity*,
and
IAN McCAW, *in his individual capacity*,

Defendants.

Case No.: 6:16-cv-00403

Hon. Robert Pitman

**PLAINTIFF DOLORES LOZANO'S OBJECTIONS TO DEFENDANT
ART BRILES' DEPOSITION DESIGNATIONS**

TO THE HONORABLE JUDGE OF THE COURT:

Plaintiff serves these objections in response to the deposition testimony designated in Art Briles' Deposition Designations. Plaintiff asserts the objections identified below. Plaintiff's objections include contiguous testimony covered by the substance of the objections within the deposition testimony.

OBJECTIONS

WES YEARY

9/9-10/5	Relevance (401, 402, 403)
10/17-11/10	Relevance (401, 402, 403)
28/22-29/14	Incomplete. Designation stops in the middle of answer.
29/25-30/8	Incomplete. Designation starts and stops in the middle of answer

DEVIN DEON CHAFIN

21:18-27:5 Relevance (401, 402, 403), Improper Character (404)
29:16-31:5 Relevance (401, 402, 403), Improper Character (404), Impeachment (609)
31:7-42:18 Relevance (401, 402, 403), Improper Character (404)
50:12-51:22 Relevance (401, 402, 403), Sexual History (412)
54:19-55:23 Hearsay (801, 802), Lack of Personal Knowledge (602)
73:24-74:14 Non-responsive.
81:22-83:21 Relevance (401, 402, 403)
87:10-89:12 Relevance (401, 402, 403), Lack of Personal Knowledge (602)
93:20-93:23 Relevance (401, 402, 403), Sexual History (412)
95:19-21 Relevance (401, 402, 403), Lack of Personal Knowledge (602)
97:1-97:21 Relevance (401, 402, 403)
100:19-101:11 Relevance (401, 402, 403), Lack of Personal Knowledge (602)
109:16-21 Relevance (401, 402, 403)
114:1-23 Relevance (401, 402, 403)
132:9-16 Relevance (401, 402, 403)

JEFF LEBBY

10:23 Incomplete. Designation ends in the middle of a question

Dated: September 22, 2023

Respectfully submitted,

/s/ Sheila P. Haddock

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